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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BIG ROCK ASSETS MANAGEMENT LLC, a  
Nevada limited liability company,

Plaintiff,

v.

MTC FINANCIAL INC. DBA TRUSTEE  
CORPS, a California Corporation, BANK OF  
AMERICA, N.A., a national association; DOES  
I-X, inclusive,

Defendants.

Case No.: 2:22-cv-01212-APG-NJK

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

Big Rock Assets Management, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have an additional thirty (30) days, up to and including **October 17, 2022**, to file its response to Big Rock's complaint, which is currently due on September 16, 2022.

Good cause exists to grant the requested extension since the parties are engaged in settlement negotiations with respect to this case and another pending in the court. *See Big Rock Assets Management, LLC v. National Default Servicing Corporation*, case no. 2:22-cv-00909-CDS-DJA. Big Rock also recently filed another case against BANA in state court. *See Big Rock Assets Management, LLC v. National Default Servicing Corporation*, No. A-22-858117-C. The parties are attempting to reach a global settlement. Incurring fees related to a response could impact a potential settlement.

This is the parties' first request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

DATED this 13th day of September, 2022.

<b>AKERMAN LLP</b>	<b>ANDREW BAO &amp; ASSOCIATES</b>
<u>/s/ Scott R. Lachman</u>	<u>/s/ Andrew A. Bao</u>
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IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: September 14, 2022

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